U.S. BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: : Chapter 13
Mildred P. Handy : Bankruptcy Case No.: 19-17889MDC
:

MOTION TO EXTEND TIME FOR THE DEBTOR TO FILE THEIR SCHEDULES AND STATEMENT OF FINANCIAL AFFAIRS PURSUANT TO BANKRUPTCY RULE 1007(c)

- 1. The above-captioned Chapter 13 Bankruptcy was filed on or about December 19, 2019 as an "emergency petition."
 - 2. The Chapter 13 Bankruptcy was assigned case number 19-17889MDC.
- 3. At the time of the subject Chapter 13 Bankruptcy filing, the Debtor was facing a Sheriff Sale on her property.
- 4. Due to the urgency involved, Debtor did not have sufficient time to complete his schedules and statements.
- 5. Debtor has experienced some difficulty with obtaining all documentation needed to prepare the completion of her schedules and Chapter 13 plan prior to the appointed due date.
- 6. The current deadline to file the schedules and statement of financial affairs is January 2, 2020.
- 7. Under Bankruptcy Rule 1007(c), the Debtors may obtain a further extension of the filing deadline for "cause" shown.
- 8. Under the circumstances, specifically the Debtor's difficulty with obtaining required documentation, the Debtor is requesting an extension of no less than 2 weeks to allow for signing and filing of the remaining schedules and statements.

WHEREFORE, the Debtor respectfully request the entry of an ORDER in the form attached, extending the time for filing the required documents.

Dated: January 2, 2020

/s/ Brad J. Sadek
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